

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re : Chapter 9  
: Case No. 13-53846  
CITY OF DETROIT, MICHIGAN, :  
: Hon. Thomas J. Tucker  
Debtor :  
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**STIPULATION FOR ENTRY OF ORDER REGARDING  
CLAIM NO. 1437 OF WADE TRIM ASSOCIATES INC.**

Wade Trim Associates Inc. (“Wade Trim”) and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Regarding Claim No. 1437 Of Wade Trim Associates Inc.* attached hereto as **Exhibit 1**.

1. On February 19, 2014, Wade Trim filed its proof of claim [Claim No. 1437] (the “Claim”) in the amount of \$69,704.29.

2. In resolution of Wade Trim’s Claim, the parties have agreed that: (a) the City will pay \$20,900.72 to Wade Trim, (b) the remainder of the Claim will be allowed as a general unsecured claim in the reduced amount of \$31,931.53 and (c) Wade Trim has no other claims against the City, whether for the pre-petition or post-petition periods.

3. Nothing in this stipulation is to be construed as a waiver of any of the City’s rights to assert and pursue any claims against Wade Trim, including, without limitation, claims under chapter 5 of the Bankruptcy Code.

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties’ stipulation.

Respectfully submitted by:

| WADE TRIM ASSOCIATES INC.   | FOLEY & LARDNER, LLP   |
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| <p>By: <u>/s/ Ralph Picano (with consent)</u><br/>Ralph Picano<br/>Wade Trim Associates Inc.<br/>500 Griswold St. Ste. 2500<br/>Detroit, MI 48226<br/>Phone: (313) 961-3650<br/><a href="mailto:rpicano@wadetrim.com">rpicano@wadetrim.com</a></p> <p><i>Representative for Wade Trim Associates Inc.</i></p> | <p>By: <u>/s/ John A. Simon</u><br/>John A. Simon (P61866)<br/>Tamar N. Dolcourt (P73425)<br/>Leah R. Imbrogno (P79384)<br/>500 Woodward Ave., Ste. 2700<br/>Detroit, MI 48226<br/>Phone: (313) 234-7100<br/><a href="mailto:jsimon@foley.com">jsimon@foley.com</a><br/><a href="mailto:tdolcourt@foley.com">tdolcourt@foley.com</a><br/><a href="mailto:limbrogno@foley.com">limbrogno@foley.com</a></p> <p><i>Counsel to the City of Detroit, Michigan</i></p> |

Dated: November 24, 2015